# MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

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February 25, 2004

Hand Delivered

The Honorable Bruce F. Duke Executive Director South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211-1649 B. C. PUBLIC SERVICE COMMISSION

B. C. PUBLIC SERVICE COMMISSION

Re: Application of Chem-Nuclear Systems, LLC (SCPSC Docket No. 2000-366-A) (Fiscal Year 2003-2004 Proceeding)

Dear Mr. Duke:

Enclosed herewith for filing with the Commission, please find twenty-five (25) copies of the prefiled rebuttal testimony of Regan E. Voit on behalf of Chem-Nuclear Systems, LLC, a Division of Duratek, Inc., which testimony is filed pursuant to the Commission's Order No. 2003-739 in the above-captioned docket. As directed in that Order, I am having a copy of the rebuttal testimony hand-delivered by law firm courier to the below-named parties of record.

Should you have any questions with respect to this testimony, please do not hesitate to contact me.

Very truly yours,

Robert T. Bockman

#### **Enclosures**

cc: David K. Avant, Esquire
The Honorable Max K. Batavia
The Honorable C. Earl Hunter
The Honorable Henry D. McMaster
Robert E. Merritt, Esquire
Catherine D. Taylor, Esquire
Hana Pokorna-Williamson, Esquire

#### **BEFORE**

THE PUBLIC SERVICE COMMISSION

OF

**SOUTH CAROLINA** 

Docket No. 2000-366-A (Year 2004 Proceeding)

REBUTTAL TESTIMONY AND EXHIBIT

OF

#### **REGAN E. VOIT**

**FOR** 

CHEM-NUCLEAR SYSTEMS, LLC, A DIVISION OF DURATEK, INC.

#### Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My rebuttal testimony addresses several of the issues which the Commission Staff raises in the prefiled testimony and exhibits of William P. Blume, Audit Department Manager. My testimony refers to specific adjustments which the Staff proposes in that evidence.

#### Q. PLEASE ADDRESS THE STAFF'S ADJUSTMENT NO. 2 IN EXHIBIT A-

1.

A. The Staff's evidence (Exhibit A-1 Adjustment # 2 and pages 15 through 17 of Mr. Blume's testimony) describes proforma Adjustment # 2, which is related to Direct Labor for Fiscal Year ("FY") 2002-2003. The adjustment consists of two parts.

1

We agree with the first part of the adjustment, identified as a \$1,125 reduction. However, we take issue with the second part of the adjustment amounting to a reduction of \$57,058 in direct costs. For its position, the Staff apparently relies solely on the estimate of Full Time Equivalents ("FTEs") in the Operations and Efficiency Plan ("OEP") as the basis for labor resources to be identified as allowable costs for FY 2002-2003. That position ignores the factors discussed on pages 9, 10 and 12 of the Staff's testimony. Although costs associated with activities such as storm water management improvements, connection to public utility systems, trench construction and backfilling, special environmental performance verifications, and unusual site maintenance work may well be considered as "irregular costs" in future proceedings, labor costs for these activities in FY 2002-2003 were actually incurred, and they should be identified as allowable costs.

Agreement among the various parties to this proceeding concerning the definition of fixed, irregular and variable costs was only reached during FY 2002-2003, as part of the collaborative review process of the OEP. For FY 2003-2004, project numbers have been established in the Costpoint accounting system to allow separate identification of fixed, irregular and variable costs to facilitate capturing and reporting costs in those categories for future proceedings.

The OEP was developed by considering a normal range of activities at the disposal site. The OEP could not anticipate the unusual rainfall that we experienced in FY 2002-2003 nor could it have anticipated all the other special operational considerations which we identified in our Application and to which

the Staff's testimony refers. Considering only three specific projects (Environmental Radiological Performance Verification Recommendations, Millstone Fuel Pin investigation, and West Swale construction), an analysis of the actual labor hours incurred indicates that over one FTE was required for these three projects in FY 2002-2003. We, therefore, believe that the Commission should identify the amount of \$1,378,934 as allowable direct labor costs for FY 2002-2003 along with its associated fringe.

#### Q. PLEASE DISCUSS THE STAFF'S ADJUSTMENT NO. 4.

A. Chem-Nuclear has requested to recover half the cost to fabricate the skid that was utilized to transport the 950-ton Maine Yankee Reactor Pressure Vessel ("RPV") to Barnwell and to support it in the disposal trench. To meet disposal requirements, the skid was used to stabilize the RPV in the trench and to minimize subsidence of it. The skid was designed to meet all transport and disposal requirements. One-half the cost of fabricating the skid was \$191,248. None of the design cost was included in this amount, even though some of that cost was most certainly related to ensuring that the skid met disposal requirements.

The alternate approach would have been to have had two separate skids: one for transportation and the other for disposal. That approach would have required two separate design efforts and the fabrication and delivery of the disposal skid and the fabrication and disposition of the transport skid. Also, the RPV would have to have been removed from the transport skid and placed on the disposal skid, increasing the cost of labor. An estimate of \$355,278 to dispose of

the RPV in this fashion is attached as REV Rebuttal Exhibit No. 1. We chose to avoid the additional costs that the alternative approach would have imposed.

The basis for the Staff's conclusion is an oversimplified use of ratios of revenue to determine cost allocations for the skid. The Staff's position fails to recognize that costs and revenues are not directly proportional for every cost element. The disposal price for the RPV was a negotiated amount agreed upon by the customer, the Budget and Control Board, and Chem-Nuclear. The price for transportation was based on a set of defined risks for the movement and handling of this large component from the Maine Yankee facility to the Barnwell site. The skid was designed and used for two separate purposes, transport and disposal. In fact, more than half of the skid remains in the trench to stabilize and support the RPV in its disposal location. Our "avoided cost" approach, using a single skid to perform both functions and splitting the cost 50/50, was much more cost effective than the alternative. Therefore, the amount of \$191,248 for which we request recovery is fair and should be considered an allowable cost.

- Q. PLEASE DISCUSS THE STAFF'S ADJUSTMENT NO. 7 FOR FISCAL YEAR 2002-2003 AND ADJUSTMENT NO. 6. FOR FISCAL YEAR 2003-2004.
- A. The Staff proposes to eliminate recovery of \$123,698 in expenses associated with the OEP Plan. These adjustments are described in Adjustment # 7 on Exhibit A-1 for FY 2002-2003, and as Adjustment # 6 on Exhibit AA-3 for FY 2003-2004.

Chem-Nuclear did not request the \$123,698 as an adjustment for FY 2002-2003, contrary to the Staff's testimony. That amount was shown on Exhibit B of our Application in the column marked "Total Actual/Projected Cost" with

the explanation that this was a prior year adjustment. The amount was not included in the column marked "Adjustments to Level of FY 02/03 Costs," which Chem-Nuclear submitted in its Application. Chem-Nuclear did not intend for this amount to be an adjustment to FY 2002-2003 costs since one-half of the cost had already been identified as an allowable cost in the Commission's Order No. 2003-188.

Exhibit D of our Application, "Allowable Costs for FY 2003/2004," does request the recovery of the remaining \$123,698 of the costs associated with preparation of the OEP. The Staff's Adjustment # 6 on Exhibit AA-3 again proposes eliminating this amount until the Commission hears evidence on this matter. All parties in the collaborative review process relied on the OEP. We have presented the testimony of Mr. Mark Childs of Project Time & Cost, Inc., the company that performed the OEP study, which describes in considerable detail the preparation and value of the OEP. On the basis of the value of the OEP and its use by all of the parties, Chem-Nuclear asks the Commission to identify as an allowable cost the remaining 50% of the costs for the OEP in this proceeding.

# Q. PLEASE ADDRESS THE STAFF'S RECOMMENDATION FOR TOTAL FIXED COSTS FOR FISCAL YEAR 2003-2004.

A. The Report of the Collaborative Review of the OEP demonstrated that there was consensus among the parties about the costs associated with operating the Barnwell disposal site. The parties participating in the collaborative review process were the Budget and Control Board, Chem-Nuclear, the Public Service Commission Staff, the Consumer Advocate, the Department of Health and

Environmental Control, and the Atlantic Compact Commission. In that process, they evaluated the information presented in the OEP and further refined that information. The result was an improved characterization of costs into the three categories which were approved by the Commission in Order No. 2003-537, upon receipt of the Report.

Fixed costs are those that are essential to ensure safety and compliance at the Barnwell site, as well as some administrative functions. Those costs are not waste dependent and they remain essentially at the same level year to year. They might increase with inflation or pay adjustments as the years go by, but they will not change substantially. Fixed costs clearly are not anticipated to decrease from year to year. The parties participating in the collaborative review process agreed on the values and classification of the fixed costs as shown in Appendix A of the Report of the Collaborative Review. However, the Staff's testimony appears to be inconsistent with the agreement.

During the collaborative review process, there were discussions, debates, and compromises on several issues. In the end, however, all parties came to agreement on the joint recommendations which we made to the Commission about the value and classification of allowable costs going forward for the operation of the disposal site. There was no recommendation in the Report of the Collaborative Review about differences for the Commission to resolve because there were no differences expressed by the parties in the Report. The parties had only one request: that the Commission approve the recommendations to which they had all agreed.

Therefore, we oppose the Staff's recommendation to lower the amount of fixed costs by \$146,678. In Order No. 2003-537, the Commission approved the approach upon which the parties agreed and which they recommended in the Report of the Collaborative Review for determining the amount of fixed costs for FY 2003-2004. That approach included increasing the amount to account for pay increases, inflation, and changes in fringe rates over the two-year period from 2002 to 2004. Chem-Nuclear has managed its operations through this fiscal year based on that agreed upon, approved approach. Consistent with that approach, we adjusted costs for 7% labor factor, 4% materials inflation factor and a fringe adjustment of 7%. Even though the Staff's testimony acknowledged adjusting labor 7% and fringe by more than 7%, the Staff's testimony failed to include any inflation factor for materials. The Staff's recommendation to reduce fixed costs for FY 2003-2004 is not consistent with Order No. 2003-537 nor is it reasonable, and it could be detrimental to the continued safe operation of the Barnwell disposal site.

# Q. DO YOU HAVE ANOTHER COMMENT ABOUT THE STAFF'S ADJUSTMENT TO FIXED LABOR COSTS?

A. Yes. The Staff also recommends reducing fixed labor costs by 3.41 FTEs. That recommendation reduces costs from the fixed cost category, upon which all parties agreed in the Report of the Collaborative Review, and it ignores the parties' agreement that the fixed labor costs that the Report identified are necessary for the safe, compliant operation of the site and that they should not change significantly from year-to-year. The costs might increase due to inflation

and pay adjustments, but certainly would not decrease unless a significant change occurred in the approach to site operations. The parties agreed there would be some labor impact as waste volumes decreased and that is why they agreed upon the establishment of the variable labor rates in the collaborative review process. Any reduction in FTE's will result from variable or irregular labor, not fixed labor.

I am deeply concerned that the Staff has recommended such a significant adjustment to fixed labor for the fiscal year in which we are now operating. Through the collaborative review process, the parties gained a better understanding of the costs we incur in operating the disposal site. I consider this fact to be of great importance because the parties left that process with the recognition that our commitment to safety and compliance, and the use of our labor force to realize that commitment, impose a cost which is not dependent on waste receipts.

In addition to those concerns which I have already stated, the proposed reduction of the fixed costs for FY 2003-2004 which the Staff now suggests will have a material financial impact on Chem-Nuclear. We are already eight (8) months into the fiscal year, and we have been operating under the recommendations agreed to by the parties in the Report of the Collaborative Review and approved by Order No. 2003-537. The consequence of adoption of the Staff's adjustment will be to penalize us for our consistency with those recommendations.

We request that the Commission reject the Staff's recommendation regarding the fixed costs. We further request that the fixed costs, as shown in Appendix A of the Report of the Collaborative Review, be increased by 7 % for labor and 4 % for materials, that they be adjusted for the change in fringe rates from 33.4% to the 41.9%, and that the Commission identify them as allowable costs in this proceeding.

# Q. DO YOU HAVE A COMMENT CONCERNING THE STAFF'S ADJUST-MENTS NOS. 7 AND 8 FOR FISCAL YEAR 2003-2004?

A. Yes. We concur with the Staff's testimony regarding costs not under the jurisdiction of the Commission. We include those costs in our Application because they are allowable costs under the Atlantic Compact Commission Act, even though they do not fall under the jurisdiction of the Commission.

#### Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.

## Logistics & Engineering Group 140 Stoneridge Drive Columbia, SC 29210

## **MEMORANDUM**

To:	Hisham Shamkhani	REV Rebuttal Exhibit No. 1 (Hearing Exhibit)					
From:	Ahmad Ghandour						
Date:	February 17, 2004						
Subjec	ct: Cost Estimate for Placing the Maine Yankee RPV o	on dedicated Disposal Saddles					
CC:	Regan Voit, Deborah Ogilvie, and Rich Dabolt						
the exi	stal cost estimate for lifting the Maine Yankee Reactor isting skid and placing it on disposal saddles is \$355.2 ts of the following:	Pressure Vessel (RPV) off 76. Cost estimate breakdown					
0	Labor for dedicated disposal saddles (Engineering design, manufacturing, & management)	\$41,464					
٥	Travel & Expenses	\$214					
۵	Supplies & Material \$114						
۵	Subcontractors						
	<ol> <li>Mammoet (lifting off existing skid &amp; Place on disposal saddles)</li> </ol>	\$175,788					
	2) Hittman Transport for shipping two dedicated Disposal saddles from fabricator to Barnwell	\$14,690					
٥	Fabricator	\$118,640					
0	Cribbing under disposal saddles to meet Barnwell Loading limits	<b>\$4,366</b>					
Total		\$355,276					

Please note that the cost estimate above does not include any fee.

VALL SEUMBREN GROUP

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MAMMOET

**FAX COVER SHEET** 

Mammost USA Inc. - Rosharon Office

20525 FM 521 Rosharon TX

USA 77583

Phone +1 281 369-2200 Fax +1 281 363-2178 Website www.mammoet.com Duratel

To:

Fax:

Pages: From:

Mammoet USA Inc.

CC:

MAMMWET

### Duratek, Barnwell, RPV Lift

Date: January 23, 2004.

Ahmad Ghandour **Project Manager** Duratek 140 Stone Ridge Drive Columbia, South Carolina RFQ No:

Project No:

0010008767-P037

MN SAP Refer:

RFQ# 7, RFV lift/retrieve transport frame, Barnwell

Dear Ahmad.

29210

Mammoet Nuclear thanks you for your valued invitation to tender for the above works and take pleasure in submitting our proposal for your consideration. We appreciate being qualified as a potential Heavy Haul and Rigging Service Provider for this project.

Mammoet can offer pricing for the movement as follows:

Lift of RPV in order to retrieve Transport frame (excl. transport):

\$154,200.00

This pricing is based on a duration of 4 working days and includes mobilization of 2 gantry systems with a combined minimum capacity of 950 tons, a qualified Mammoet crew to execute the job, adequate load spreading to ensure the maximum allowable ground pressure of 6000 psf is not exceeded, forklift for assembly, and all engineering costs for Mammoet equipment.

Our price is subject to equipment availability and final scope of work.

Best regards, MAMMOET NUCLEAR.

Marco Klarenbeek

Office: 281-369-2200

Cell:

281-914-2133

Fax:

281-369-2178

e-mail: marco.klarenbeek@mammoet.com

# METAL TRADES, INC.

P.O. BOX 129, HOLLYWOOD, SOUTH CAROLINA 29449-0129



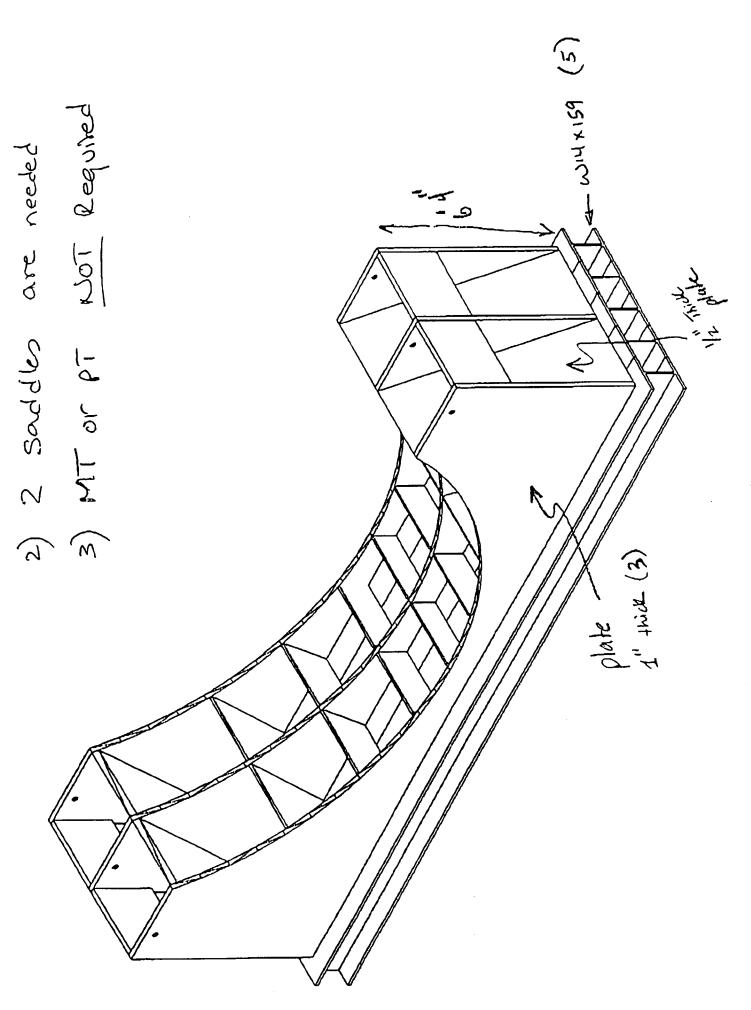
Quote No. 204260

	Date: 02/18/04
Duratek/Chem-Nuclear	F.O.B: MTVFab Shop
140 Stoneridgo Drive	
Columbia, SC 29210	N Charleston, SC
Ph: (803)758-1803	Town Alet 20
Fax: (803)24529770	Terms: Net 30

ntion:	Ahmad Ghandor
arence:	Disposal Saddle / Budgetary Quote

are pleased to cubmit the following quotation:

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and paint the following Items for the above reference:	}		
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Disposal Saddle sketch provided by customer.		1	
Material: Wide Flange Beam A672 Gr. 50			
Plating: A36			
Est W( = 50,000 Lbs./Each			
Total Wt = 100,000 Lbs.			
All welds are per AWS D1.1 visual inspection only.			
Total Cost:		\$104,070.00	
Delivery Schedule: 11 Weeks A.R.O.			
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Karen Kirby

0: )ate: Ahmad Ghandour

iubject:

2/16/04 4:59PM Pricing, Saddle from Charleton to CN

hmad, price to move a saddle from the fabricator in Charleston, SC to Barnwell, SC:

)imensions: 26' L 8' W 10' H

Veight: 70,000

equipment: 4 axle lowboy with 10' deck extension

rice: \$7,345.00

Dottie DeFreest; Rhonda Nance; Roger Betow :C:

#### QUOTATION

## KENT ENTERPRISES, INC.

P.O. BOX 195

#### FLUKER, LOUISIANA 70436

PHONE 985-748-8162 FAX 985-748-7513

Duratek

ATTENTION: Ahmad Ghandour

	INÓUIKY NUMBEK	INQUIRY DATE
uary 16, 200	4	DELIVERY TIME
	TERMS	DELIVERY LIMB

Thank you for your inquiry. We are pleased to quote as follows:

#### MIXED HARDWOOD

90 pcs. 8" x 8" x 12' \$32.00 each

Freight to Barnwell, S.C. \$950.00

Total = \$ 3,830

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#### BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2000-366-A

In Re:	Application of Chem-Nuclear System LLC, a Division of Duratek, Inc., for Adjustment in the Levels of Allowal Costs and for Identification of Allow Costs	r ) ole )
	I, ElizaBeth A. Blitch, do hereby cert	ify that I have this date served one (1) copporting
prefile	ed Rebuttal Testimony of Regan E. Voi	it for the Fiscal Year 2003-2004 proceeding in this
docker	upon the following parties by causing sa	aid copies to be hand-delivered by law firm corrier to
each p	earty at the stated address:	
Rober	t D. Merritt, Esquire	The Honorable Henry Dargan McMaster
	of the Governor	Attorney General
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Colum	nbia, South Carolina 29211	Rembert C. Dennis Building, Suite 519
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Hana l	Pokorna-Williamson, Esquire	The Honorable C. Earl Hunter
	ept. of Consumer Affairs	Commissioner
3600 F	Forest Drive, 3d Floor	SCDHEC
Colum	ibia, South Carolina 29250-5757	2600 Bull Street
		Columbia, South Carolina 29201
	onorable Max K. Batavia	
	ic Compact Commission	Catherine D. Taylor, Esquire
	Main Street	SCE&G
Suite 8		Palmetto Center, 13th Floor
Colum	ıbia, South Carolina 29201	Columbia, South Carolina 29218
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	ant General Counsel	Y
S.C. B	Sudget and Control Board	Clino Beth H. Bletch
	Main Street, Suite 800	ElizaBeth A. Blitch, Paralegal
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February 25, 2004 Columbia, South Carolina